

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN	:	Civil No. 19-2875 (RBK/JS)
N-NITROSODIMETHYLAMINE (NDMA):	:	
CONTAMINATION PRODUCTS	:	HON. ROBERT B. KUGLER
LIABILITY LITIGATION	:	
	:	HON. JOEL SCHNEIDER
	:	

LOCAL CIVIL RULE 37.1(B) CERTIFICATION

I certify under penalty of perjury that the foregoing is true and correct. On October 15, 2019, and November 4, 2019, as to each issue raised in Plaintiffs' opening letter brief regarding the "macro" discovery issues, Plaintiffs met and conferred with opposing counsel via phone in a good faith effort to resolve by agreement the issues raised without the intervention of the Court, and the parties have been unable to reach agreement on them.

Executed on November 5, 2019

RESPECTFULLY SUBMITTED,



Adam M. Slater (NJ Bar 046211993)
MAZIE SLATER KATZ & FREEMAN, LLC
103 Eisenhower Parkway, 2nd Floor
Roseland, New Jersey 07068
Tel.: 973-228-9898
Fax: 973-228-0303
aslater@mazieslater.com
Counsel for Plaintiffs